

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 12- **236 JNE**

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|---------------------------|---|--------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | INFORMATION |
| Plaintiff, |) | |
| |) | (18 U.S.C. § 641) |
| v. |) | (18 U.S.C. § 1341) |
| |) | (18 U.S.C. § 1347) |
| JAMES N. HOOD, |) | |
| |) | |
| Defendants. |) | |

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT 1
(Theft of Public Money)

From in or about January 2006 to in or about April 2011, in
the State and District of Minnesota, the defendant,

JAMES N. HOOD,

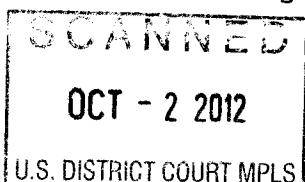
did willfully and knowingly steal, purloin and convert to his own
use state and federal Medicaid money jointly administered by the
Minnesota Department of Human Services and the Centers for Medicare
and Medicaid Services, namely Medical Assistance benefits to his
children W.H., J.H. and G.H., which he well knew he was not
entitled, having a value of approximately \$369,061.91. All in
violation of Title 18, United States Code, Section 641.

COUNT 2
(Health Care Fraud)

From in or about January 2006 to in or about April 2011, in
the State and District of Minnesota, the defendant,

JAMES N. HOOD,

did knowingly and willfully execute and attempt to execute a scheme



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and artifice to defraud Medicaid, a health care benefit program as defined in Title 18, United States Code, Section 24(b), and to obtain money and funds owned by and under the custody and control of Medicaid by means of materially false and fraudulent pretenses, representations, and promises, to-wit the false representation of their income, in connection with the delivery of and payment for health care benefits, items, and services, including the payment of \$369,061.91 for Medicaid programs such as Medical Assistance (MA), including Community Alternatives for Disabled Individuals (CADI), \$20,783.17 for Cost-Effective Health Insurance (CEHI), and \$12,794.14 for the Louisiana Children's Health Insurance Program (LaCHIP) on behalf of minor children W.H., J.H., and G.H. All in violation of Title 18, United States Code, Section 1347.

COUNT 3

(Mail Fraud)

From in or about December 28, 2010, in the State and District of Minnesota, the defendant,

JAMES N. HOOD,

with the intent to defraud, devised and willfully participated in, with knowledge of its fraudulent nature, a scheme and artifice to defraud and obtain money by materially false and fraudulent pretenses, representations, and promises. For the purposes of executing and attempting to execute the scheme and artifice to defraud and deprive, defendant knowingly caused to be delivered by United States mail according to the direction thereon the following matter, to-wit, a \$349.68 payment from Ramsey County Human Services

of Medicaid benefits, Check Number 0001351311 to his minor child, W.H., in violation of Title 18, United States Code, Section 1341.

FORFEITURE ALLEGATIONS

Counts 1 through 3 of this Information are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(7), and Title 28, United States Code, Section 2461(c).

As the result of the offenses alleged in Counts 1 through 3 of this Information, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(7), any property, real or personal, which constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Sections 641, 1341, and 1347.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and by Title 28, United States Code, Section 2461(c). The property subject to forfeiture includes, but is not limited to, the following:

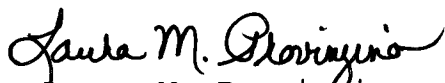
The real property located at 4 North Mallard Road, North Oaks, Minnesota 55127.

All in violation of Title 18, United States Code, Sections 641, 981(a)(1)(C), 1341, 1347, and Title 28, United States Code,

Section 2461(c).

Dated: October 1, 2012

B. TODD JONES
United States Attorney


BY: Laura M. Provinzino
Assistant U.S. Attorney
Attorney ID No. 0329691